

EUGENE N. HANSEN (*pro hac vice*)
Email: hansene@sec.gov
SAMANTHA M. WILLIAMS (*pro hac vice*)
DOUGLAS M. MILLER (Cal. Bar No. 240398) (local counsel)
100 F Street NE
Washington, DC 20549
Tel: (202) 551-6091
Attorneys for Plaintiff
Securities and Exchange Commission

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
Western Division**

**SECURITIES AND EXCHANGE
COMMISSION,**

Case No. 2:23-cv-05379-AH(BFMx)

Plaintiff,

v.

AMERICAN PATRIOT BRANDS,
INC., *et al.*,

STIPULATION TO SET THE TRIAL DATE AND OTHER CASE DEADLINES

Defendants.

Plaintiff Securities and Exchange Commission (the “SEC”), Defendants American Patriot Brands, Inc., Urban Pharma, LLC, DJ&S Property #1, LLC, TSL Distribution, LLC, Robert Y. Lee, Brian L. Pallas and J. Bernard Rice (the “Defendants”), and Relief Defendants Puerto Rico One Corporation, Castro Business Enterprises, LLC and Legion Accounting Services, Inc. (the “Relief Defendants”) (collectively the “Parties”), respectfully submit this Stipulation To Set the Trial Date and Other Case Deadlines.

1 WHEREAS, on July 19, 2023, this case was assigned to the Hon. Fernando
2 M. Olguin, after being transferred from the District of Puerto Rico [Dkt. No. 33];

3 WHEREAS, between August 8, 2023 and December 4, 2024, Judge Olguin
4 issued scheduling orders as well as an order setting forth summary judgment
5 procedures [Dkt. Nos. 49, 50, 81, 89, 93, 97];

6 WHEREAS, Judge Olguin set the following deadlines for fact discovery,
7 expert discovery, a mandatory settlement conference and motions for summary
8 judgment:

Fact Discovery	Nov. 6, 2024 [Dkt. No. 81]
Expert Discovery	Feb. 18, 2025 [Dkt. No. 97]
Mandatory Settlement Conf.	Feb. 25, 2025 [Dkt. No. 93]
Summary Judgment Motion	Feb. 19, 2025 [Dkt. No. 81]

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15 WHEREAS, on December 6, 2024, this case was transferred to the Hon.
16 Anne Hwang [Dkt. No. 98];

17 WHEREAS, on December 20, 2024, the Court entered an Order granting the
18 Parties' Stipulation to Set Briefing Schedule on Motion for Summary Judgment
19 and to Vacate Other Pre-Trial and Trial Dates [Dkt. No. 104] (the "December 20
20 Order");

21 WHEREAS, the December 20 Order requires the Parties to complete the
22 briefing on Plaintiff's anticipated motion for summary judgment by April 9, 2025;

23 WHEREAS, the December 20 Order vacates all future case deadlines set by
24 Judge Olguin with the exception of expert disclosure and discovery deadlines and
25 the deadline for the mandatory settlement conference;

26 WHEREAS, the December 20 Order requires the Parties to file a stipulation
27 and proposed order suggesting trial and other dates in accordance with the

1 worksheet attached to the Court's Order Setting Scheduling Conference, available
2 on the Court's webpage; and

3 WHEREAS, pursuant to the December 20 Order, the Parties have conferred
4 and have agreed on a proposed trial date and other case deadlines as set forth
5 below.

6 ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED, subject
7 to Court approval, that the Court should set the following schedule for the
8 commencement of trial and other pre-trial deadlines:

Event	Proposed Date
Jury Trial [Tuesday at 8:30 am] Estimated Duration: 12 days	10/14/2025
Final Pretrial Conference, Hearing on Motions in Limine [Wednesday at 1:30 pm]	9/24/2025
Last Date to Hear Motions [Wednesday at 1:30 pm]	5/21/2025
Trial Filings (first round) <ul style="list-style-type: none">• Motions in Limine¹• Memoranda of Contentions of Fact and Law [L.R. 16-4]• Joint Witness List• Joint Exhibit List [L.R. 16-6.1]• Joint Status Report Regarding Settlement• Requests for judicial notice	8/13/2025
Trial Filings (second round) <ul style="list-style-type: none">• Oppositions to Motions in Limine• Joint Proposed Final Pretrial Conference Order [L.R. 16-7]• Joint Agreed Upon Proposed Jury Instructions• Disputed Proposed Jury Instructions	9/3/2025

27 ¹ Each party may file no more than five (5) motions in limine without seeking
28 leave from the Court.

Event	Proposed Date
<ul style="list-style-type: none">• Joint Proposed Verdict Forms• Joint Proposed Statement of the Case• Proposed Voir Dire Questions, if any• Table of challenged exhibits• Deposition designations as to which the parties have any dispute or objection	

Dated: January 6, 2025

Respectfully submitted,

/s/ Eugene N. Hansen

Eugene N. Hansen (pro hac vice)
Samantha M. Williams (pro hac vice)
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549
Email: hansene@sec.gov
Telephone: (202) 551-6091

*Attorneys for Plaintiff
Securities and Exchange Commission*

/s/ Russell Duncan

Russell Duncan (pro hac vice)
Clark Hill PLC
1001 Pennsylvania Ave. NW
Suite 1300 South
Washington, DC 20004
Email: rduncan@clarkhill.com
Telephone: (202) 640-6657

*Attorneys for Defendants and Relief
Defendants*